

# -EXHIBIT 4-

**Jasit Gotra**  
**December 7, 2017**

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

Civil Action No. 4:15-cv-06314-YGR

\*\*\*\*\*  
ABANTE ROOTER AND PLUMBING, INC., \*  
MARK HANKINS, and PHILIP J. CHARVAT, \*  
individually and on behalf of all \*  
others similarly situated, \*

Plaintiffs \*

v. \*

ALARM.COM INCORPORATED, and \*  
ALARM.COM HOLDINGS, INC., \*

Defendants \*

\*\*\*\*\*

DEPOSITION OF: JASIT GOTRA  
CATUOGNO COURT REPORTING SERVICES, INC.  
155 South Main Street, Suite 201  
Providence, Rhode Island  
December 7, 2017 2:03 p.m.

Ellen M. Muir  
Court Reporter

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1           A.       I wouldn't because of the time. I mean, we  
2       were too small. I'm not sure what the recordkeeping  
3       practices were.

4           Q.       But such as they were if anybody knew how you  
5       kept records, it was you?

6           MR. SCHLESSINGER: Objection. Form of the  
7       question. I just have to get my objection out. (To  
8       the witness) if you can just pause a second before  
9       you answer so I can do that, then you can go ahead  
10      and answer.

11          Q.       And did you -- was this e-mail kept and made  
12      at or about the time it was sent?

13          A.       Yes.

14          Q.       Okay. And do you know where this e-mail was  
15      produced?

16          A.       No.

17          Q.       You don't know what case it came from? Okay.  
18      And I'm going to show you now Exhibit 2, which is Bates  
19      stamped VMS 293. I'll try to make it a little bigger here.  
20      Do you recognize that document? And you may not.

21          A.       No.

22          Q.       Do you remember providing documents to the  
23      federal trade commission in connection with a civil  
24      investigative demand served on you?

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1           A.       I recall that we provided a bunch of  
2 documents.

3           Q.       A bunch of documents?

4           A.       Yeah.

5           Q.       And was one of the things they required you to  
6 provide where you got your opt-in data?

7           A.       Yes, I believe so, as part of the message.

8           Q.       And is this document an example of what you  
9 provided to the FTC?

10          A.       I don't recall. I'm not, like, there was --  
11 we provide hundreds of documents and as far as I remember.  
12 I'm not sure if this was one of them.

13          Q.       And do you know where Revocalize got the data  
14 that it was providing to you as opt-in data?

15          A.       No.

16          Q.       Did VMS, slash, Alliance receive complaints  
17 about consumers about calls that they were getting?

18          A.       Can you repeat that. I apologize.

19          Q.       Did you get complaints from people who said,  
20 Look, I'm on the Do Not Call List. Why am I being called?

21          A.       Yes.

22          Q.       When did you start getting those complaints?

23          A.       I don't recall.

24          Q.       It's pretty earlier on in VMS's, slash,